

# **Exhibit 2**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**AMENDED SHORT FORM COMPLAINT  
FOR DAMAGES FOR INDIVIDUAL  
CLAIMS AND DEMAND FOR JURY  
TRIAL**

Plaintiff(s) named below, for their Complaint against Defendants named below,  
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Eileen Shea

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
consortium claim:

N/A

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,  
conservator):

Kathleen Shea as representative and administrator of the Estate of Eileen Shea

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence  
at the time of implant:

New York

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence  
at the time of injury:

New York

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

New York

7. District Court and Division in which venue would be proper absent direct filing:

District of Arizona, Phoenix Division

8. Defendants (check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other: \_\_\_\_\_

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

☐ Recovery® Vena Cava Filter

☒ G2® Vena Cava Filter

☐ G2® Express Vena Cava Filter

☐ G2® X Vena Cava Filter

☐ Eclipse® Vena Cava Filter

☐ Meridian® Vena Cava Filter

☐ Denali® Vena Cava Filter

☐ Other: \_\_\_\_\_

11. Date of Implantation as to each product:

April 7, 2009

\_\_\_\_\_

12. Counts in the Master Complaint brought by Plaintiff(s):

- 1 ☒ Count I: Strict Products Liability – Manufacturing Defect
- 2 ☒ Count II: Strict Products Liability – Information Defect (Failure
- 3 to Warn)
- 4 ☒ Count III: Strict Products Liability – Design Defect
- 5 ☒ Count IV: Negligence – Design
- 6 ☒ Count V: Negligence – Manufacture
- 7 ☒ Count VI: Negligence – Failure to Recall/Retrofit
- 8 ☒ Count VII: Negligence – Failure to Warn
- 9 ☒ Count VIII: Negligent Misrepresentation
- 10 ☒ Count IX: Negligence *Per Se*
- 11 ☒ Count X: Breach of Express Warranty
- 12 ☒ Count XI: Breach of Implied Warranty
- 13 ☒ Count XII: Fraudulent Misrepresentation
- 14 ☒ Count XIII: Fraudulent Concealment
- 15 ☒ Count XIV: Violations of Applicable Virginia Law Prohibiting
- 16 Consumer Fraud and Unfair and Deceptive Trade Practices
- 17 ☐ Count XV: Loss of Consortium
- 18 ☐ Count XVI: Wrongful Death
- 19 ☒ Count XVII: Survival
- 20 ☒ Punitive Damages
- 21 ☐ Other(s): \_\_\_\_\_: (please state the facts
- 22 supporting this Count in the space immediately below)
- 23 \_\_\_\_\_
- 24 \_\_\_\_\_
- 25 \_\_\_\_\_
- 26 13. Jury Trial demanded for all issues so triable?
- 27 ☒ Yes
- 28 ☐ No

1 RESPECTFULLY SUBMITTED this 19th day of April, 2019.

2 **SHRADER & ASSOCIATES, L.L.P.**

3 By: /s/ A. Layne Stackhouse

4 A. Layne Stackhouse

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10 *Attorney for Plaintiff*

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that on this 19th day of April, 2019, I electronically transmitted the  
13 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal  
14 of a Notice of Electronic Filing.  
15

16 /s/A. Layne Stackhouse